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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

JUAN M. CEJA-NEGRETTE,

Defendant.

2:14-mj-00555-CWH

STIPULATION TO CONTINUE
TRIAL (1st REQUEST)

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Nadia Ahmed, Special Assistant United States Attorney, counsel for the United States of America, and Heidi A. Ojeda, Assistant Federal Public Defender, counsel for Juan M. Ceja-Negrete (hereinafter "Defendant") that the trial date currently set for Wednesday, January 27, 2016 at 9:00 a.m., be vacated and continued for sixty (60) days or to a date and time convenient to the Court.

This stipulation is entered into for the following reasons:

1. The parties are in the process of negotiating a resolution of the case that would obviate the need for trial. The parties need additional time to do so.

2. The Defendant is not in custody and agrees to the continuance.

3. Denial of this request for a trial continuance would prejudice both the Defendant and the Government and unnecessarily consume this Court's valuable resources, taking into account the exercise of due diligence.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

5. The additional time requested by this stipulation, is excludable in computing the time within which the Defendant must be indicted and the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(b) and § 3161(h)(8)(A), considering the factors under 18 U.S.C. § 3161(h)(8)(B)(I) and (iv).

6. There have been no previous requests for a continuance of the trial in this case.

DATED this 22nd day of January, 2016.

Respectfully submitted,

DANIEL G. BOGDEN
United States Attorney

/s/ Heidi A. Ojeda

By: _____
Heidi A. Ojeda
Assistant Federal Public Defender
Counsel for Defendant
Juan M. Ceja-Negrete

/s/ Nadia Ahmed

By: _____
Nadia Ahmed
Special Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA
3

4 UNITED STATES OF AMERICA,)

2:14-mj-00555-CWH

5 Plaintiff,)

6 vs.)

ORDER CONTINUING TRIAL

7 JUAN M. CEJA-NEGRETE,)

8 Defendant.)

9
10 Based on the pending stipulation of counsel, and good cause appearing therefore, the
11 court hereby finds that:

12 IT IS HEREBY ORDERED that the deadline to continue the trial, currently scheduled
13 for January 27, 2016, at the hour of 9:00 a.m., is continued to April 6, 2016, at 9:00 a.m.

14 DATED January 25, 2016

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UNITED STATES MAGISTRATE JUDGE